

1 **Bruce Berline, Esq.**
2 **Law Office of Bruce Berline**

3 Macaranas Building, Second Floor

4 P.O. Box 5682 CHRB

5 Garapan, Saipan, MP 96950

6 Telephone: (670) 233-3663

7 Facsimile: (670) 233-5262

8 Attorney for Lawrence Kalen

9
10 **UNITED STATES DISTRICT COURT**

11 **FOR**

12 **THE NORTHERN MARIANA ISLANDS**

13 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 08-00014

14 Plaintiff,) DEFENDANT LAWRENCE KALEN'S
15 vs.) MOTION FOR REVIEW AND
16) REVOCATION OF DETENTION ORDER

17 KALEN, GREGGORY SABLAM, KALEN,)
18 LAWRENCE, and SABLAM, MANUEL)
19 ALDAN,

20 Defendants.) Time: 9:00 a.m.
21) Date: May 29, 2008
22) Judge: Munson

23 Lawrence Kalen, defendant in the above-entitled action, by and through his counsel , Bruce
24 Berline, hereby moves the court, pursuant 18 U.S.C. § 3145 (b), to review and revoke Defendant's
25 detention order and set any needed conditions for his release pending trial.

26 This motion is made on the grounds the Government has failed to prove that Defendant Lawrence
27 Kalen is not entitled to be released pending trial and thus Defendant's continued detention is in violation
28 of the Bail Reform Act of 1984, 18 U.S.C. § 3141, *et seq.*, and Defendant's rights under the Fifth and
 Eighth Amendments of the United States Constitution prohibiting the deprivation of liberty without due
 process and excessive bail, respectively.

This motion is based on all the files and records of this case, and on the accompanying memorandum of points and authorities filed contemporaneously with this motion

Dated this 23rd day of May, 2008.

BRUCE BERLINE
Attorney for Defendant
P.O. Box 5682 CHRB
Saipan, MP 96950